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LETTER REGARDING VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
COMMENTS ON THE DRAFT TECHNICAL MEMORANDUM NON-TIME CRITICAL REMOVAL
ACTION PROJECT COMPLETION SUMMARY FOR SOLID WASTE MANAGEMENT UNIT 3
(SWMU 3) PIER 10 SANDBLAST YARD AND SOLID WASTE MANAGEMENT UNIT 7B SMALL
BOATS SANDBLAST YARD JEB LITTLE CREEK VA

8/27/2013

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

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August 27, 2013

Mr. Bryan Peed
NAVFAC Mid Atlantic
9742 Maryland Avenue
Code OPHREV4, Bldg. N-26, Rm.3300
Norfolk, Virginia 23511-3095

Subject: Joint Expeditionary Base Little Creek
Draft Technical Memorandum
Non-Time Critical Removal Action Project Completion Summary
SWMU 3 – Pier 10 Sandblast Yard
SWMU 7b – Small Boats Sandblast Yard

Dear Mr. Peed:

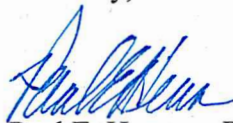
The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Draft Technical Memorandum - Non-Time Critical Removal Action Project Completion Summary for SWMU 3 – Pier 10 Sandblast Yard and SWMU 7b – Small Boats Sandblast Yard* dated August 2013. Based on this review the following comments are offered.

1. Section 1.3: Please revise the last sentence of the 3rd paragraph to reflect the findings of the finalized risk assessment update.
2. Section 1.5: While noting a thorough explanation of PRG development is provided in the EE/CA for each SWMU, please add some text briefly explaining why Table 1-1 and Table 1-2 have similar COCs with different PRGs.
3. Section 3.1: Please verify the list of pre-construction meeting attendees. The roster provided in Attachment F does not include representatives from Port Weanack or Bay Environmental but does list a representative from Paradise Point Marine.
4. Section 3.3: Please add a bullet noting the remobilization to deploy turbidity curtains that would facilitate a deeper depth when the environmental dredge was replaced with the clamshell dredge.

5. Section 3.4: In the 3rd paragraph please note a deeper turbidity curtain was deployed when the clamshell dredge replaced the environmental dredge.
6. Section 3.4.2: In the 1st sentence of the 1st paragraph please insert "(letter, Attachment G)" following "VDEQ". In the 2nd paragraph please specify the "Disposal Facility" receiving the decontamination fluids and include its location. Concerning the disposal documentation provided in Attachment I, please separate the dredge sediment disposal tickets from the decontamination fluid disposal tickets.
7. Section 4, General Comment: The use of a clamshell dredge and the passive release of water from the dredge bucket during operation (as opposed to supernatant water from the barge passing through a filter prior to discharge to surface water) are changes from what was presented in the NTCRA Action Memorandum for each SWMU. Please add a sub-section to completely explain and discuss the QA/QC changes made in the field in order to implement the action.
8. Section 5: The 3rd sentence should note dredged sediment was transported up river to Port Weanack where the dredged material was solidified prior to offloading to dump trucks for transport to the landfill.
9. Attachment E: The core photographs provided include photos (#21 and #23) showing "marina debris in bucket" yet the photo is taken at SWMU 7b where there is no marina. Please revise the captions accordingly.

This concludes VDEQ's comments concerning this document at this time. If you have any questions concerning these comments, please give me a call at (804) 698-4464.

Sincerely,



Paul E. Herman, P.E.
Remediation Project Manager

cc: NABLC Tier 1 (electronic copy)
NABLC Correspondence File
Milt Johnston, VDEQ-TRO (electronic copy)